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12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 IN THE MATTER OF THE) No. CR 09-70395 MISC (JCS)
17 EXTRADITION OF)
18 PAUL ANTHONY SAYNO TRINIDAD) **STIPULATION TO CONTINUE
19) BAIL HEARING TO
20) SEPTEMBER 8, 2009, 1:30 P.M.**
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20 The United States, on behalf of Latvia, moves to continue the bail hearing
21 scheduled for September 2 to September 8, 2009, at 1:30 p.m. Mr. Trinidad, through his
22 counsel, does not object to the requested continuance. The reason for the request is that
23 Mr. Trinidad's Memorandum in Support of Application for Bail requested additional
24 materials from Latvia, and counsel for Latvia requests the additional time in order to
25 communicate about that request with Latvia.

26 With permission of the Court, the government will file a reply brief on
27 September 2.

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STIPULATION TO CONTINUE BAIL HEARING
CR 09-70395 MISC (JCS)

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2 Respectfully submitted,
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5 Dated: August 31, 2009
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JOSEPH P. RUSSONIELLO
United States Attorney

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/s/ Nat Cousins
Assistant United States Attorney
Acting for the Republic of Latvia

STIPULATED

Dated: August 31, 2009

/s/ Raphael M. Goldman
Raphael M. Goldman
Cristina C. Arguedas
ARGUEDAS, CASSMAN & HEADLEY, LLP
Attorneys for Paul Trinidad

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[PROPOSED] ORDER GRANTING STIPULATION, CR 09-70395 MISC (JCS)

Upon the Stipulation of the parties, the bail hearing scheduled for September 2 is ordered continued to September 8, 2009, at 1:30 p.m., before this Court. The government is ordered to file its reply brief by September 2, 2009.

Date: 8/31/09

